

Exhibit 19

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

HUNTAIR, INC.

Plaintiff,

vs.

CLIMATECRAFT, INC.

Defendant.

)
)
)
) Case No. 07 C 6890
)
) The Honorable Judge Coar
)
) Magistrate Judge Denlow
)
)
)

**HUNTAIR, INC.'S DISCLOSURE OF ASSERTED CLAIMS AND
INFRINGEMENT CONTENTIONS**

Plaintiff Huntair, Inc. (“Huntair”) provides the following Disclosure of Asserted Claims and Infringement Contentions in compliance with the Scheduling Order in this case and the Notification of Docket Entry dated February 21, 2008. Huntair reserves the right to amend this disclosure to conform to the results of ongoing discovery.

ASSERTED CLAIMS

1. U.S. Patent No. 7,137,775 (“the ‘775 patent”): Claims 1, 2, 4, 5, 6, 7, 9, 11, 12, 14 and 15.
2. U.S. Patent No. 7,179,046 (“the ‘046 patent”): Claims 1, 6, 8, 9, 10, 12, 14, 15 and 19.

ACCUSED INSTRUMENTALITIES

ClimateCraft’s Fan Array Products are currently accused of infringing the asserted claims of the ‘775 and ‘046 patents listed above. “ClimateCraft’s Fan Array Products” mean all fan array or fan matrix products or systems manufactured, marketed or sold by ClimateCraft, including, but not limited to, the fan array system referred to by ClimateCraft as “Matrix” and the fan system that is the subject of ClimateCraft’s bid to obtain a contract to install an array of fans in the Northwest Community Hospital, located in Arlington Heights, Illinois.

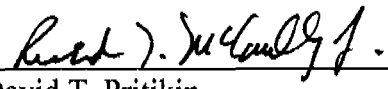
INFRINGEMENT

Infringement charts for the ‘775 patent are attached hereto as Exhibit A. Infringement charts for the ‘046 patent are attached hereto as Exhibit B. Unless otherwise noted in the infringement charts, all claim elements and limitations are considered to be literally infringed by ClimateCraft’s Fan Array Products. Huntair reserves the right to assert infringement under the doctrine of equivalents for any limitation of the ‘775 or ‘046 patents that ClimateCraft contends is not literally present in its Fan Array Products. Huntair further reserves the right to assert

infringement under the doctrine of equivalents based on a claim construction ruling on any disputed claim terms and/or based on further information that may become available during ongoing discovery.

Respectfully submitted,

Dated: March 17, 2008

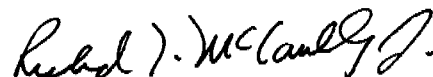
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CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of March, 2008, a true and correct copy of the foregoing document, HUNTAIR, INC.'S DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS, was served via U.S. Mail, first-class postage pre-paid (with a courtesy copy by e-mail) to the following counsel for ClimateCraft, Inc.:

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Attorney for Plaintiff Huntair, Inc.

EXHIBIT A**U.S. Patent No. 7,137,775 Infringement Claim Chart**

U.S. Patent No. 7,137,775 B2	Infringement Contentions
1. A fan array fan section in an air-handling system comprising:	ClimateCraft's Fan Array Products have a fan array fan section in an air-handling system. <i>See, e.g.</i> , CL 1250-1341; 1437-1521.
(a) at least six fan units;	ClimateCraft's Fan Array Products have at least six fan units. <i>See, e.g.</i> , CL 1251-1252; 1438-1440.
(b) said at least six fan units arranged in a fan array;	ClimateCraft's Fan Array Products have the least six fan units arranged in a fan array. <i>See, e.g.</i> , CL 1251-1252; 1438-1440; ClimateCraft's Response to Interrogatory No. 1.
(c) an air-handling compartment within which said fan array of fan units is positioned; and	ClimateCraft's Fan Array Products have an air-handling compartment within which said fan array of fan units is positioned. <i>See, e.g.</i> , CL 1251-1252; 1438-1440.
(d) an array controller for controlling said at least six fan units to run at substantially peak efficiency by strategically turning selective ones of said at least six fan units on and off, wherein each fan unit has a peak efficiency operating range outside of which it operates at a reduced efficiency, and wherein said array controller is programmed to operate said at least six fan units at substantially peak efficiency by strategically turning off at least one fan unit operating at reduced efficiency and running the remaining fan units within said peak efficiency operating range.	The ClimateCraft Fan Array system at Northwest Community Hospital ("NCH") includes a Programmable Logic Controller ("PLC"), which communicates with the Building Automation System ("BAS") which may constitute an array controller for controlling said at least six fan units to run at substantially peak efficiency by strategically turning selective ones of said at least six fan units on and off, wherein each fan unit has a peak efficiency operating range outside of which it operates at a reduced efficiency, and wherein said array controller is programmed to operate said at least six fan units at substantially peak efficiency by strategically turning off at least one fan unit operating at reduced efficiency and running the remaining fan units within said peak efficiency operating range. <i>See, e.g.</i> , NCH Specification, § 2.15; CL 1250-1341; 1437-1521; ClimateCraft's Response to Interrogatory No. 1.
2. The fan array fan section in an air-handling system of claim 1, wherein said at least six fan units are plenum fans.	In ClimateCraft's Fan Array Products, the at least six fan units are plenum fans. <i>See, e.g.</i> , CL 1254; 1442.
4. The fan array fan section in an air-handling system of claim 1, wherein said at least six fan units are a plurality of fan units arranged in a fan array configuration selected from the group consisting of:	In ClimateCraft's Fan Array Products, the at least six fan units are a plurality of fan units arranged in a fan array configuration that is a true array configuration. <i>See, e.g.</i> , CL 1251-1254; 1438-1442.

U.S. Patent No. 7,137,775 B2	Infringement Contentions
(a) a true array configuration; (b) a spaced pattern array configuration; (c) a checker board array configuration; (d) rows slightly offset array configuration; (e) columns slightly offset array configuration; and (f) a staggered array configuration.	
5. The fan array fan section in an air-handling system of claim 1, wherein said at least six fan units include at least two vertically arranged fan units.	In ClimateCraft's Fan Array Products, the at least six fan units include at least two vertically arranged fan units. <i>See, e.g.</i> , CL 1251-1252; 1438-1440.
6. The fan array fan section in an air-handling system of claim 1, wherein each of said at least six fan units is positioned within a fan unit chamber.	In ClimateCraft's Fan Array Products, each of the at least six fan units is positioned within a fan unit chamber. <i>See, e.g.</i> , CL 1251-1252; 1438-1440.
7. The fan array fan section in an air-handling system of claim 1, wherein each of said at least six fan units is suspended within a respective said fan unit chamber such that there is an air relief passage there below.	In ClimateCraft's Fan Array Products, each of the at least six fan units is suspended within a respective said fan unit chamber such that there is an air relief passage there below. <i>See, e.g.</i> , CL 1251-1252; 1438-1440.
9. The fan array fan section in an air-handling system of claim 1, wherein each of said at least six fan units are mounted in a grid system.	In ClimateCraft's Fan Array Products, each of the at least six fan units are mounted in a grid system. <i>See, e.g.</i> , CL 1251-1254; 1438-1442.
11. The fan array fan section in an air-handling system of claim 1, further comprising an array of backdraft dampeners, each backdraft dampener in line with a respective fan unit.	ClimateCraft's Fan Array Products further comprise an array of backdraft dampeners, each backdraft dampener in line with a respective fan unit. <i>See, e.g.</i> , CL 1254; 1442.
12. The fan array fan section in an air-handling system of claim 1, said array controller is programmed to operate said at least six fan units at peak efficiency for a performance level based on a criteria selected from the following group of criteria: (a) air volume; (b) level of air flow; (c) pattern of air flow; and (d) number of fan units to operate.	The ClimateCraft Fan Array system at NCH includes a PLC, which communicates with the BAS which may be programmed to operate said at least six fan units at peak efficiency for a performance level based on a criteria selected from the following group of criteria: (a) air volume; (b) level of air flow; (c) pattern of air flow; and (d) number of fan units to operate. <i>See, e.g.</i> , NCH Specification, § 2.04.
14. The fan array fan section in an air-handling system of claim 1, said array controller is programmed to selectively	The ClimateCraft Fan Array system at NCH includes a PLC, which communicates with the BAS which may be programmed to selectively control the

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control the speed of each of said at least six fan units to run at substantially peak efficiency.	speed of each of said at least six fan units to run at substantially peak efficiency. <i>See, e.g.</i> , NCH Specification, § 2.15; CL 1250-1341; 1437-1521; ClimateCraft's Response to Interrogatory No. 1.
15. The fan array fan section in an air-handling system of claim 1, said air-handling compartment positionable within a structure such that said air-handling system conditions the air of said structure.	In ClimateCraft's Fan Array Products, the air-handling compartment is positionable within a structure such that said air-handling system conditions the air of said structure. <i>See, e.g.</i> , CL 1250-1341; 1437-1521.

EXHIBIT B**U.S. Patent No. 7,179,046 Infringement Claim Chart**

U.S. Patent No. 7,179,046 B2	Infringement Contentions
1. A fan array fan section in an air-handling system comprising:	Climate Craft's Fan Array Products have a fan array fan section in an air-handling system. <i>See, e.g.</i> , CL 1250-1341; 1437-1521.
(a) an air-handling compartment;	Climate Craft's Fan Array Products have an air-handling compartment. <i>See, e.g.</i> , CL 1251-1254; 1438-1442.
(b) a plurality of fan units;	Climate Craft's Fan Array Products have a plurality of fan units. <i>See, e.g.</i> , CL 1251-1254; 1438-1442.
(c) said plurality of fan units arranged in a fan array;	Climate Craft's Fan Array Products have said plurality of fan units arranged in a fan array. <i>See, e.g.</i> , CL 1251-1252; 1438-1440.
(d) said fan array positioned within said air-handling compartment;	Climate Craft's Fan Array Products have said fan array positioned within said air-handling compartment. <i>See, e.g.</i> , CL 1251-1252; 1438-1440.
(e) said air-handling compartment associated with a structure such that said air-handling system conditions the air of said structure; and	Climate Craft's Fan Array Products have said air-handling compartment associated with a structure such that said air-handling system conditions the air of said structure. <i>See, e.g.</i> , CL 1250-1341; 1437-1521.
(f) a control system for operating said plurality of fan units at substantially peak efficiency by strategically turning on and off selective ones of said plurality of fan units.	Climate Craft's Fan Array Products have a control system for operating said plurality of fan units at substantially peak efficiency by strategically turning on and off selective ones of said plurality of fan units. <i>See, e.g.</i> , CL 1261-1266; 1449-1452.
6. The fan array fan section in an air-handling system of claim 1, wherein said plurality of fan units are plenum fans.	In Climate Craft's Fan Array Products, the plurality of fan units are plenum fans. <i>See, e.g.</i> , CL 1254; 1442.
8. The fan array fan section in an air-handling system of claim 1, wherein said plurality of fan units are arranged in a fan array configuration selected from the group consisting of: (a) a true array configuration; (b) a spaced pattern array configuration; (c) a checker board array configuration; (d) rows slightly offset array configuration; (e) columns slightly offset array configuration; and (f) a staggered array configuration.	In Climate Craft's Fan Array Products, the plurality of fan units are arranged in a fan array configuration that is a true array configuration. <i>See, e.g.</i> , CL 1251-1254; 1438-1442.
9. The fan array fan section in an air-	In Climate Craft's Fan Array Products, the plurality

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handling system of claim 1, wherein each of said plurality of fan units is positioned within a fan unit chamber.	of fan units is positioned within a fan unit chamber. <i>See, e.g.</i> , CL 1251-1252; 1438-1440.
10. The fan array fan section in an air-handling system of claim 1, wherein each of said plurality of fan units is suspended within a respective said fan unit chamber such that there is an air relief passage therebelow.	In Climate Craft's Fan Array Products, each of the plurality of fan units is suspended within a respective said fan unit chamber such that there is an air relief passage therebelow. <i>See, e.g.</i> , CL 1251-1252; 1438-1440.
12. The fan array fan section in an air-handling system of claim 1, wherein each of said plurality of fan units is mounted in a grid system.	In Climate Craft's Fan Array Products, each of the plurality of fan units is mounted in a grid system. <i>See, e.g.</i> , <i>See, e.g.</i> , CL 1251-1254; 1438-1442.
14. The fan array fan section in an air-handling system of claim 1, further comprising an array of backdraft dampeners, each backdraft dampener in line with a respective fan unit.	ClimateCraft's Fan Array Products further comprise an array of backdraft dampeners, each backdraft dampener in line with a respective fan unit. <i>See, e.g.</i> , CL 1254; 1442.
15. A fan array fan section in an air-handling system comprising:	Climate Craft's Fan Array Products have a fan array fan section in an air-handling system. <i>See, e.g.</i> , CL 1250-1341; 1437-1521.
(a) an air-handling compartment;	Climate Craft's Fan Array Products have an air-handling compartment. <i>See, e.g.</i> , CL 1251-1254; CL 1438-1442.
(b) a plurality of fan units;	Climate Craft's Fan Array Products have a plurality of fan units. <i>See, e.g.</i> , CL 1251-1254; 1438-1442.
(c) said plurality of fan units arranged in a fan array;	Climate Craft's Fan Array Products have said plurality of fan units arranged in a fan array. <i>See, e.g.</i> , CL 1251-1252; 1438-1440.
(d) said fan array positioned within said air-handling compartment;	Climate Craft's Fan Array Products have said fan array positioned within said air-handling compartment. <i>See, e.g.</i> , CL 1251-1252; 1438-1440.
(e) said air-handling compartment association with a structure such that the said air-handling system conditions the air of said structure; and	Climate Craft's Fan Array Products have said air-handling compartment associated with a structure such that the said air-handling system conditions the air of said structure. <i>See, e.g.</i> , CL 1250-1341; 1437-1521.
(f) a control system for controlling said plurality of fan units, said control system allowing control of the speed of the fan units in said plurality of fan units such that they run at substantially peak efficiency.	Climate Craft's Fan Array Products have a control system for controlling said plurality of fan units, said control system allowing control of the speed of the fan units in said plurality of fan units such that they run at substantially peak efficiency. <i>See, e.g.</i> , CL 1261-1266; 1449-1452.
19. A fan array fan section in an air-handling system comprising:	Climate Craft's Fan Array Products have a fan array fan section in an air-handling system. <i>See, e.g.</i> , CL

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	1250-1341; 1437-1521.
(a) an air-handling compartment;	Climate Craft's Fan Array Products have an air-handling compartment. <i>See, e.g.</i> , CL 1251-1254; 1438-1440.
(b) a plurality of independently controllable fan units;	Climate Craft's Fan Array Products have a plurality of independently controllable fan units. <i>See, e.g.</i> , CL 1251-1254; 1261-1266; 1438-1442; 1449-1452.
(c) said plurality of fan units arranged in a fan array;	Climate Craft's Fan Array Products have said plurality of fan units arranged in a fan array. <i>See, e.g.</i> , CL 1251-1252; 1438-1440.
(d) said fan array positioned within said air-handling compartment;	Climate Craft's Fan Array Products have said fan array positioned within said air-handling compartment. <i>See, e.g.</i> , CL 1251-1252; 1438-1440.
(e) said air-handling compartment associated with a structure such that the said air-handling system conditions the air of said structure;	Climate Craft's Fan Array Products have said air-handling compartment associated with a structure such that the said air-handling system conditions the air of said structure. <i>See, e.g.</i> , CL 1250-1341; 1438-1442.
(f) a control system for controlling the speed of the fan units in said plurality of fan units such that they run at substantially peak efficiency.	Climate Craft's Fan Array Products have a control system for controlling the speed of the fan units in said plurality of fan units such that they run at substantially peak efficiency. <i>See, e.g.</i> , CL 1261-1266; 1449-1452.